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"Reports by Carriers on Incidents Involving Animals During Air Transport"

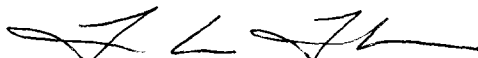
These comments are submitted on behalf of The Farm Animals section of The Humane Society of the United States (HSUS), the nation's largest animal protection organization, in support of the proposed U.S. Department of Transportation (DOT) rule change. It is our understanding that this rule change will require airlines to report if pets of U.S. families are injured, lost, or killed while in their keeping. This is an important step forward and the DOT is to be commended for proposing this change.

However, as The HSUS is dedicated to the protection of all animals we would request that the final rule be applied more broadly to include farm animals. The ethical and scientific arguments suggest that reporting the loss, injury, or death of animals other than pets is essential. All vertebrates are considered sentient in that they are capable of feeling pain and suffering. It is impossible to overstate the horror and potential for suffering of animals that die from suffocation, grievous injuries, or due to temperature extremes. Reports seem to indicate that baby chicks sent through the mail with no consideration given to them as "live animals" suffer from high mortality rates in this manner. While they are not considered pets they suffer nonetheless.

Furthermore, ground transportation of animals in an inappropriate manner that causes death or suffering can result in cruelty charges being laid. Forty-two states have laws against carrying an animal in a vehicle in a "cruel or inhumane manner". Cruelty charges can range from fines to jail. In light of the seriousness of the charges it would seem incomprehensible that airlines do not even have to report the deaths and injuries of animals under their care.

In summary we strongly support this proposed rule change and hope that your agency will finalize the rule as quickly as possible. Furthermore, we would urge that the final rule define "animal" more broadly to include all animals. Animals are not unfeeling inanimate objects and should not be treated as such. Thank you for your time and consideration.

Sincerely,



Tamiko J. Thomas, M.Sc.
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Promoting the protection of all animals

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